

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division



TECSEC, INC.,

Plaintiff,

v.

ADOBE INC. et al.,

Defendants.

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) Case No. 1:10-cv-115-LO/TCB
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VERDICT FORM

When answering the following questions and filling out this Verdict Form, please follow the directions provided throughout the form. Your answer to each question must be unanimous. Some of the questions contain legal terms that are defined and explained in detail in the Jury Instructions. Please refer to the Jury Instructions if you are unsure about the meaning or usage of any legal term that appears in the questions below.

We, the jury, unanimously agree to the answers to the following questions and return them under the instructions of this Court as our verdict in this case.

QUESTION NO. 1 – Patent Ownership

Did TecSec prove by a preponderance of the evidence that it is the sole owner of each of the patents-in-suit when TecSec filed its complaint?

(A “Yes” answer below is in favor of TecSec; a “No” answer below is in favor of Adobe)

Yes No

Please go onto Question 2 regardless of how you answered this question.

QUESTION NO. 2 – Direct Infringement

Do you find that TecSec has proven by a preponderance of the evidence that Adobe has directly infringed any of the following Asserted Claims?

(A “Yes” answer below is in favor of TecSec; a “No” answer is in favor of Adobe)

The asserted system claims:

	A “YES” answer is in favor of TecSec	A “NO” answer is in favor of Adobe
Claim 8 of the '702 Patent	Yes <u>X</u>	No _____
Claim 14 of the '781 Patent	Yes <u>X</u>	No _____

The asserted method claims:

	A “YES” answer is in favor of TecSec	A “NO” answer is in favor of Adobe
Claim 1 of the '702 Patent	Yes <u>X</u>	No _____
Claim 1 of the '452 Patent	Yes <u>X</u>	No _____
Claim 1 of the '755 Patent	Yes <u>X</u>	No _____
Claim 1 of the '781 Patent	Yes <u>X</u>	No _____

QUESTION NO. 3 – Active Inducement of Infringement

Do you find that TecSec has proven by a preponderance of the evidence that Adobe has actively induced infringement of any of the following Asserted Claims?

(A “Yes” answer below is in favor of TecSec; a “No” answer is in favor of Adobe)

The asserted system claims:

	A “YES” answer is in favor of TecSec	A “NO” answer is in favor of Adobe
Claim 8 of the '702 Patent	Yes _____	No <u>X</u>
Claim 14 of the '781 Patent	Yes _____	No <u>X</u>

The asserted method claims:

	A “YES” answer is in favor of TecSec	A “NO” answer is in favor of Adobe
Claim 1 of the '702 Patent	Yes _____	No <u>X</u>
Claim 1 of the '452 Patent	Yes _____	No <u>X</u>
Claim 1 of the '755 Patent	Yes _____	No <u>X</u>
Claim 1 of the '781 Patent	Yes _____	No <u>X</u>

QUESTION NO. 4 – Invalidity by Anticipation

Did Adobe prove by clear and convincing evidence that any of the following asserted claims are invalid as anticipated?

(A “Yes” answer below is in favor of Adobe; a “No” answer is in favor of TecSec)

The asserted system claims:

	A “YES” answer is in favor of Adobe	A “NO” answer is in favor of TecSec
Claim 8 of the ’702 Patent	Yes _____	No <u>X</u>
Claim 14 of the ’781 Patent	Yes _____	No <u>X</u>

The asserted method claims:

	A “YES” answer is in favor of Adobe	A “NO” answer is in favor of TecSec
Claim 1 of the ’702 Patent	Yes _____	No <u>X</u>
Claim 1 of the ’452 Patent	Yes _____	No <u>X</u>
Claim 1 of the ’755 Patent	Yes _____	No <u>X</u>
Claim 1 of the ’781 Patent	Yes _____	No <u>X</u>

QUESTION NO. 5 – Invalidity by Obviousness

Did Adobe prove by clear and convincing evidence that any of the following asserted claims are invalid as obvious?

(A “Yes” answer below is in favor of Adobe; a “No” answer is in favor of TecSec)

The asserted system claims:

	A “YES” answer is in favor of Adobe	A “NO” answer is in favor of TecSec
Claim 8 of the '702 Patent	Yes _____	No <u>X</u> _____
Claim 14 of the '781 Patent	Yes _____	No <u>X</u> _____

The asserted method claims:

	A “YES” answer is in favor of Adobe	A “NO” answer is in favor of TecSec
Claim 1 of the '702 Patent	Yes _____	No <u>X</u> _____
Claim 1 of the '452 Patent	Yes _____	No <u>X</u> _____
Claim 1 of the '755 Patent	Yes _____	No <u>X</u> _____
Claim 1 of the '781 Patent	Yes _____	No <u>X</u> _____

If for any claim (on a claim by claim basis) you answered “YES” to Questions 2 or 3 and “NO” to Questions 4 and 5 for the same claim, continue to Question 6. Otherwise stop because your deliberations are complete. Please sign the form below.

QUESTION NO. 6 – Damages

What sum of money, if any, did TecSec prove by a preponderance of the evidence would reasonably compensate TecSec for any infringement by Adobe that occurred between February 5, 2010 and March 3, 2011? Provide the amount, if any, in dollars and cents. If you find TecSec is entitled to no damages, enter a "0" amount.

\$ 1.75 million

Please sign the form below.

Foreperson 

Date

12/19/2018